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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

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SEP 23 1998

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations.)
(Hilliard and Marysville, Ohio))

MM Docket No. 98-125
RM-9291
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS OF CITICASTERS CO.

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September 23, 1998

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SUMMARY

The Proposal (either as amended by the Comments or as described in the Commission's *Notice*) advances the public interest by providing an independent community with its first local transmission service and by increasing broadcasting service to nearly a half-million listeners without creating any unserved or underserved areas. According to Commission precedent, which highly values the provision of the first local transmission service to a community and the expansion of broadcast services to additional listeners, the Proposal should be quickly adopted.

The two sets of opposing comments (collectively, "Opposing Comments") ignore the vast weight of authority in support of the Proposal. In fact, the Opposing Comments appear no more than an attempt by Columbus-area radio licensees to delay the proposed service improvements in order to shield their revenues from the possibility of additional competition. They barely question that Hilliard, under Commission precedent, deserves its own local transmission service, and wholly ignore that the Proposal would result in far more persons receiving broadcast service from a radio station operating on Channel 289A, preferring instead to question the Commission's established policies and whether Citicasters could construct a Hilliard facility in light of Citicasters' existing presence in the Columbus market. Both arguments fail, as the Commission's policies remain consistent with today's radio realities, and the Department of Justice already considered the Proposal when it approved the acquisition of the Nationwide stations by Citicasters. Accordingly, the Proposal should be adopted without delay so that Hilliard and nearly 500,000 persons may enjoy expanded local broadcast services as soon as possible.

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 98-123
Table of Allotments,)	RM-9291
FM Broadcast Stations.)	
(Marysville and Hilliard, Ohio))	

To the Chief, Allocations Branch:

REPLY COMMENTS OF CITICASTERS CO.

Citicasters Co. ("Citicasters"), by its attorneys and pursuant to Section 1.415 of the Commission's Rules, hereby submits these Reply Comments in support of the proposal (the "Proposal") addressed by the Commission's *Notice of Proposed Rule Making*, DA 98-123 (released July 17, 1998), in the above-captioned proceeding ("*Notice*"), 1/ especially as amended by Citicasters' Comments filed September 8, 1998 ("*Comments*"). 2/

1/ Citicasters also incorporates, by reference, its prior pleadings in this matter.

2/ As in the Comments, the term "Proposal" will be used when the statement could refer to either the reference coordinates for the allotment described in the *Notice* (the "Initial Proposal") or the better reference coordinates -- which would increase the number of persons able to receive service from a Hilliard station -- proposed in the Comments (the "Amended Proposal"). Because the Initial Proposal and the Amended Proposal each provide Hilliard its own transmission service and increases broadcast service to more than 400,000 persons, Citicasters supports both, although it respectfully urges the Commission to adopt the Amended Proposal, as that would provide additional broadcast service to more individuals.

Two sets of comments were filed against the Proposal. One was filed by Ingleside Radio, Inc., which is the licensee of WWCD(FM), Grove City, Ohio, a community located approximately the same distance from Columbus as Hilliard (the "Ingleside Comments"). The other was filed by several other licensees of Columbus-area radio stations (the "Joint Comments") (collectively with the Ingleside Comments, the "Opposing Comments"). Neither gave reason for the Commission to reject or further delay a reallocation that would provide the deserving and distinct community of Hilliard its own transmission service and would increase broadcast service to more than 400,000 persons without creating any unserved or underserved areas.

I. INTRODUCTION

Approval of the Proposal follows directly from extensive Commission precedent. The Proposal advances the public interest:

- 1) by providing an independent community with its first local transmission service, and
- 2) by increasing broadcasting service to nearly a half-million listeners
- 3) without creating any unserved or underserved areas.

According to Commission precedent, which highly values the provision of the first local transmission service to a community and the expansion of broadcast services to additional listeners, the Proposal should be quickly adopted.

By contrast, the Opposing Comments ignore the vast weight of authority in support of the Proposal. In fact, nothing in the Opposing Comments

suggests that they are any more than an attempt by Columbus DMA radio licensees to block or delay improvements in broadcast service to inhabitants of that DMA in order to shield their revenues from the possibility of additional competition. The Opposing Comments did not seriously dispute that:

- 1) Hilliard is an independent community;
- 2) with its own large commercial enterprises;
- 3) its own historical district and government; and
- 4) its own social, religious, medical and retail services.

In fact, they barely question that Hilliard, under the clear standards of Commission precedent, deserves its own local transmission service, and wholly ignore that the Proposal would result in far more persons receiving broadcast service from a radio station operating on Channel 289A.

Instead, the Opposing Comments attack the Commission's established policy with regard to distinct communities within an urbanized area and the Telecommunications Act of 1996. *See* Joint Comments at 3-7. Moreover, they contend, without any factual support, that the U.S. Department of Justice would prevent Citicasters from fulfilling its pledge to apply for -- and build out -- a construction permit for a Hilliard Channel 289A, *see* Joint Comments at 7-9, and that the Proposal would somehow threaten competition in the Columbus market.

Neither of these attacks have any basis. The Commission's allotment policies remain consistent with its established reasoning and the realities of today's radio market. Moreover, the United States Department of Justice considered the

proposed move of WKFX(FM) to Hilliard when it approved the acquisition of the Nationwide stations by Citicasters. 3/ Accordingly, the Proposal should be adopted without delay in order that Hilliard and nearly 500,000 persons may enjoy expanded local broadcast services as soon as possible.

II. HILLIARD IS A DISTINCT COMMUNITY UNDER THE COMMISSION'S ESTABLISHED POLICIES AND PRECEDENT.

As demonstrated at length in the Comments, Hilliard qualifies as an independent community that merits its own transmission service. See Comments at 5-12 & Exhibit 3, Items A-H. Because the Proposal would bring Hilliard its first local transmission service, it should be approved under the Commission's established criteria for approving proposed reallocations, which have long deemed provision of a first local transmission service as one of the top three reasons for endorsing a proposed allotment change. 4/

A. Hilliard Is Its Own Community, Which Deserves Its Own Local Transmission Service.

Neither set of Opposing Comments refutes the considerable evidence demonstrating that Hilliard is, and thinks of itself as, a community separate from Columbus. As noted in the Comments, the Commission has established that it will

3/ File Nos. BAL/BALH-971113EA-ES. Since the Comments were filed, the Commission has approved changing the call sign of WKFX(FM) to WZAZ-FM. For purposes of clarity, these Reply Comments will refer to WKFX throughout.

4/ See Report and Order, Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Parker and Port St. Joe), 11 FCC Rcd 1095 (¶ 4) (Allocations Branch 1996) ("Parker & Port St. Joe Order").

“recognize a community’s presumptive need for local transmission service” and grant reallocation unless there is substantial evidence that the community in question is a mere appendage of a nearby city, as measured by the extent to which the proposed allocation would serve the city’s urbanized area, the proximity of the community to the city, and the dependence of the community on that city for fundamental services. 5/

Neither set of Opposing Comments questions that the reallocation of Channel 289A to Hilliard would cause less than 50 percent of the Columbus Urbanized Area to be within WKFX(FM)’s principal service area. Nor does either set of Opposing Comments dispute that Hilliard is at least as far away from Columbus as a number of communities with FM allocations. 6/ In fact, the census map submitted with the Ingleside Comments only confirms that Upper Arlington -- which has its own FM allocation -- lies squarely between Hilliard and Columbus proper. Moreover, Hilliard is naturally separated from Columbus, as the Scioto

5/ See *Faye & Richard Tuck, Inc.*, 3 FCC Rcd 5374 (¶ 24) (1988).

6/ Even the Ingleside Comments, which suggest Hilliard is not independent because it is geographically nearer to Columbus than Marysville, offer no basis to reject the Proposal. Primarily, these comments fall short because they ignore all the other indicia that indicate Hilliard is a physically and socially separate entity from Columbus, as recounted further below. *See infra*. However, the Ingleside Comments also ignore one other telling statistic: Hilliard is the exact same distance from Columbus as the community of license for Ingleside’s own station (as measured by the web site www.indo.com/distance, which has been used in other Commission proceedings.) *See attached*. Thus, the existing FM allocation to Grove City, which has a 1990 population roughly equal to the estimated population of Hilliard in 1996, itself suggests that Hilliard should merit its own transmission service.

River lies between the two communities, a fact which is not true about a number of other Columbus area communities with FM allotments that are comparably as close to Columbus as Hilliard (including Westerville, Gahanna, and Upper Arlington.)

Most important, neither set of Opposing Comments counters the extensive evidence demonstrating that Hilliard is an independent community. 7/ In fact, as described in the Comments, the eight criteria used to determine the independence of communities in Urbanized Areas confirm the independence of Hilliard. First, as noted, Hilliard has its own sources of employment for its residents, including such corporate taxpayers as CompuServe, Inc., Red Roof Inns, Inc., Gates McDonald & Company, Medex, Inc., Novus/Discover Card Services, Inc., Honda of America Mfg., Inc., and the Dana Corporation. As a result of these companies, and of many smaller enterprises, Hilliard estimates that roughly 15,000 persons (or a total equal to more than 75 percent of Hilliard's estimated 1996 population of 19,000) are employed in Hilliard. Second, Hilliard has its own local media, including two weekly newspapers. Third, Hilliard residents perceive

7/ The best that the Joint Comments can do is suggest that Compu-Serve and Gates McDonald do not exclusively describe themselves -- for purposes of identification to parties outside Ohio -- as being located in the separate community of Hilliard. See Joint Comments at n. 1. Such quibbles are irrelevant. Commission precedent only seeks to ensure that a community in an Urbanized Area has its own major sources of employment within its city limits, and Hilliard has an abundance of such large employers. Even the Joint Comments' own evidence recognizes that Gates-McDonald, a leading provider of employee benefit cost management, is headquartered in Hilliard. See Joint Comments at n.1. Moreover, that Compu-Serve maintains its headquarters in Columbus is not reason to ignore that it, as described in the Comments and other pleadings in this proceeding, also has maintained separate corporate offices in (and paid significant taxes to) Hilliard for a number of years. See Comments at Exhibit 3, Item F.

Hilliard as an area distinct from Columbus. For instance, as outlined in the Comments, Hilliard has its own Chamber of Commerce and Convention & Visitors Bureau, each of which focus on promoting Hilliard. Hilliard also maintains its own historic district, a separate Arts Council, and a distinct calendar of events addressed to the residents of Hilliard, each of which testifies to the perceived independence of Hilliard from Columbus. Hilliard even has its own nickname -- "A Pride Community" -- which again demonstrates that Hilliard is a city apart from Columbus.

Fourth, Hilliard long has had its own mayor and city council, as well as its own building, engineering, finance, service, tax, and zoning departments. Fifth, Hilliard has its own zip code. Sixth, as detailed in the Comments, there is an extensive list of religious, health and commercial services within Hilliard proper, including more than 20 churches and more than 40 restaurants. Seventh, Hilliard has its own police department, recreation and parks department, and maintains the Hilliard City School District -- which includes Hilliard as well as some of its surrounding areas. 8/

8/ In addition to all these criteria demonstrating the independence of Hilliard, the eighth criterion -- which looks to whether a community shares an advertising market with the region's central city -- presents no reason for the Commission to maintain Channel 289A in Marysville. Both Marysville and Hilliard are located in the Columbus DMA, and thus both may be seen as sharing the same advertising market. Moreover, as of the most recent Census (and contrary to the arguments of the Ingleside Comments, see Ingleside Comments at 2), both Marysville and Hilliard lie within the Columbus Metropolitan Statistical Area. See U.S. Census, 1990 Census of Population and Housing, Ohio, at 92, G-16 (1993) ("*1990 Census*") (attached). Because Marysville and Hilliard are both within the Columbus DMA, this criterion is neutral as to whether Hilliard or Marysville should be allotted

In light of this evidence that confirms Hilliard as a community separate and distinct from Columbus -- with its own sources of employment, its own media, its own government and schools, and its own religious, commercial and social entities and services -- precedent dictates adoption of the Proposal and the grant to Hilliard of its own local transmission service.

B. Current Commission and Congressional Policies, Including the Commission's *Suburban Policy Order*, Mandate Adoption of the Proposal.

Established Commission and Congressional policies endorse the Proposal. In fact, the Joint Comments implicitly admit that the Proposal is consistent with such precedent when, rather than focusing their attack on the Proposal, they instead protest the Commission and Congressional policies that endorse the Proposal. *See* Joint Comments at 3-7. Such an attack is substantively suspect and procedurally improper.

Substantively, the Joint Comments incorrectly characterize the reasons that the Commission replaced the Berwick, Suburban Community and *De Facto* Reallocation Policies (collectively, the "Suburban Community Policies"). *See* Joint Comments at 3-4. The Joint Comments claim that the Commission ended these policies as "unnecessary" solely because of "the threat of comparative renewal challenge." *Id.* at 4. Such a characterization distorts the Commission's reasoning

Channel 289A. In any case, this lone consideration is hardly cause to deny Hilliard, an independent and fast-growing community that satisfies the Commission's other seven criteria, its own transmission service.

beyond recognition. *See Suburban Community Policy, Berwick Policy and De Facto Reallocation Policy*, 93 FCC2d 436 (1983) (“*Suburban Policy Order*”).

The Commission replaced its Suburban Community Policies with a more reasonable standard for one basic reason: they were anti-competitive. Specifically, they “inhibit[ed] entry into unserved communities because they increase[d] costs to suburban applicants . . . cause[d] delays in processing . . . [and] provide[d] incumbent stations a means to delay competition from new suburban stations.” *Id.* at 445 (¶ 20). The Commission explicitly decried that the Suburban Policies were “frequently invoked by stations in large communities against the establishment of new *or improved* service in smaller communities.” *Id.* at 450 (¶ 30) (emphasis added). The Commission noted that it “no longer [saw] a substantial likelihood that, merely because of proximity to larger urban areas, licensees w[ould] provide inadequate service” to a suburban community to which they are licensed, as “suburban locations are often times as attractive to licensee applicants as nearby cities.” *Id.* at 445 (¶ 20). In fact, “[a]fter considerable reflection,” the Commission concluded that the mere possibility that a new or improved station would be better able “to compete in [a] metropolitan market” did not mean “that *it would not be able to offer programming responsive to the needs*” of its smaller community of license. *Id.* at 451 (¶ 31) (emphasis added). The Commission reiterated similar arguments against each of the policies considered in the *Suburban Policy Order*, emphasizing in each instance the importance of ensuring that incumbent stations in a metropolitan area could not use the Commission’s policies to impede competition in

their metro market. *See id.* at 444-56. Accordingly, the Commission discarded these policies because they harmed the public interest by “retard[ing] competition in metropolitan markets.” 9/

This very proceeding testifies to the wisdom of the *Suburban Policy Order*. As described, the Commission eliminated the Suburban Policies primarily in order to preclude parties like the Opposing Commenters from preventing a party like the Petitioner from being able to use the broadcast spectrum more efficiently by establishing a local transmission service for an unserved community *and* by increasing broadcast service to hundreds of thousands of people without creating any unserved or underserved populations. That the Joint Comments would attempt to cite the *Suburban Policy Order* as a basis for denying the Proposal is ironic at best, and such an argument presents no reason for the Commission to reject the Proposal, which satisfies all current and reasonable requirements under the Commission’s policies.

Moreover, the Joint Comments’ attempt to revive a long-rejected Commission policy suffers from a procedural defect: a proceeding intended to address only the need of a single community for local transmission service is not the

9/ *Id.* at 445 (¶ 20). The Commission did not suggest that *comparative* renewal challenges were a necessary reason for its decision to eliminate the anti-competitive Suburban Policies, as Joint Comments allege. *See* Joint Comments at 4. Rather, the Commission referred only to “the risk of a renewal challenge” as providing an effective regulatory incentive for stations to maintain service to their licensed communities. As the Joint Commenters are aware, the Telecom Act retained the requirement that applicants for renewal must have served the public interest to be renewed.

proper forum to demand that the Commission re-institute (or even reconsider) its Suburban Policies. Such a radical shift in Commission practice requires a broader rule making, which should not be allowed to delay grant of an independent community's first local transmission service.

III. THE OTHER ARGUMENTS OF WKFX'S COMPETITORS AGAINST THE PROPOSED SERVICE IMPROVEMENTS ARE MERITLESS.

The remaining arguments of the Opposing Comments confirm that their real objection to the Proposal is that it would strengthen WKFX's ability to compete against their own Columbus-area stations. As such increased competition has long been held to be in the public interest, however, the Opposing Comments instead try to obscure the fact that the Proposal actually would increase competition in the Columbus market by providing advertisers and nearly a half-million potential listeners a new broadcast option.

As part of this effort to obscure the facts relevant to the Proposal, the Opposing Comments repeatedly refer to the number of stations that, in the past, Citicasters has owned in the Columbus market, *see* Joint Comments at 5; Ingleside Comments at 3-4, while largely neglecting that, of the stations included in BIA's market analysis of Columbus, *see* Joint Comments at Attachment B, Citicasters *now* owns only five: WNCI(FM), WCOL-FM, WKFX(FM), WTVN(AM) and WFII(AM). As the Opposing Comments are well aware, such ownership is entirely consistent with the Commission's own local ownership standards. Moreover, the Proposal will not result in Citicasters owning any additional radio stations; it

simply will enable one of its stations to provide the first local transmission service to an unserved community and an additional competitive broadcasting outlet to nearly a half-million more people.

The Proposal is also consistent with the Department of Justice's recent review of Citicasters' ownership and proposed acquisition of Columbus-area radio stations in connection with the Department's consideration of Citicasters' transaction with Nationwide Mutual Insurance Company ("Nationwide"). As part of that review (and contrary to the insinuations of the Joint Comments, *see* Joint Comments at 7-8), the Justice Department was fully informed of the Proposal, which was already pending at that time. The Justice Department also understood that, under Commission precedent, the Proposal was likely to be approved by the Commission, in which case Citicasters would move WKFX to Hilliard.

As the Commission is aware, the Justice Department recently has concluded this review and conditioned its approval of the Nationwide acquisitions on the divestiture of several Columbus-area radio stations already owned by Citicasters. The Department, however, did not require Citicasters to divest WKFX or otherwise condition its approval of the Nationwide transactions on the proposed move of WKFX to Hilliard. In fact, Citicasters decided to accept the Department's conditions in part because they enabled Citicasters to maintain its ownership of WKFX and to pursue its Proposal to improve broadcast service to the Columbus area. Although Citicasters understood that the Commission would have to apply its own precedent in determining whether to adopt the Proposal, it reasonably expected

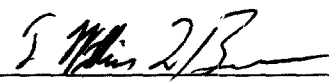
that such a decision would be based on the Commission's well established policies favoring first local transmission and more efficient broadcast service. Citicasters now respectfully requests that the Commission move quickly to decide this matter under those policies, so as not to delay unnecessarily the significant public interest benefits that would flow from the Proposal.

IV. CONCLUSION

The Commission should not delay grant of Hilliard's first local transmission service because of the anticompetitive protests of incumbent Columbus stations. The Amended Proposal would enable a frequency currently allotted to a community with other broadcast facilities to provide a new broadcast service to more than 470,000 additional people, while continuing to provide service to more than 94 percent of WKFX's existing potential audience. And this change would have the critical additional benefit of providing a growing and historically distinct community its first local transmission service. Accordingly, for all the foregoing reasons, the Amended Proposal should be quickly adopted.

Respectfully submitted,

HOGAN & HARTSON L.L.P.

By: 
Marissa G. Repp
F. William LeBeau

Attorneys for Citicasters Co.

September 23, 1998

DECLARATION

I hereby declare, under penalty of perjury, that the statements contained in the Reply Comments are true and correct to the best of my personal knowledge and belief.

Name: 

Title: Benjamin L. Homel, CEO

Date: September 23, 1998

Distance result

Distance between **Columbus, Ohio, United States** and **Grove City, Ohio, United States**, as the crow flies:

9 miles (15 km) (8 nautical miles)

Initial heading from Columbus to Grove City:

south-southwest (210.2 degrees)

Initial heading from Grove City to Columbus:

north-northeast (30.1 degrees)

See [these places on the map](#) (courtesy [Xerox PARC](#)).

See [driving directions](#) (courtesy [MapQuest](#)).

Columbus, Ohio, US

County: **Franklin County**

Location: **39:59:20N 82:59:15W**

Population (1990): **632910**

Elevation: **800 feet**

Grove City, Ohio, US

County: **Franklin County**

Location: **39:52:23N 83:04:29W**

Population (1990): **19661**

Elevation: **835 feet**

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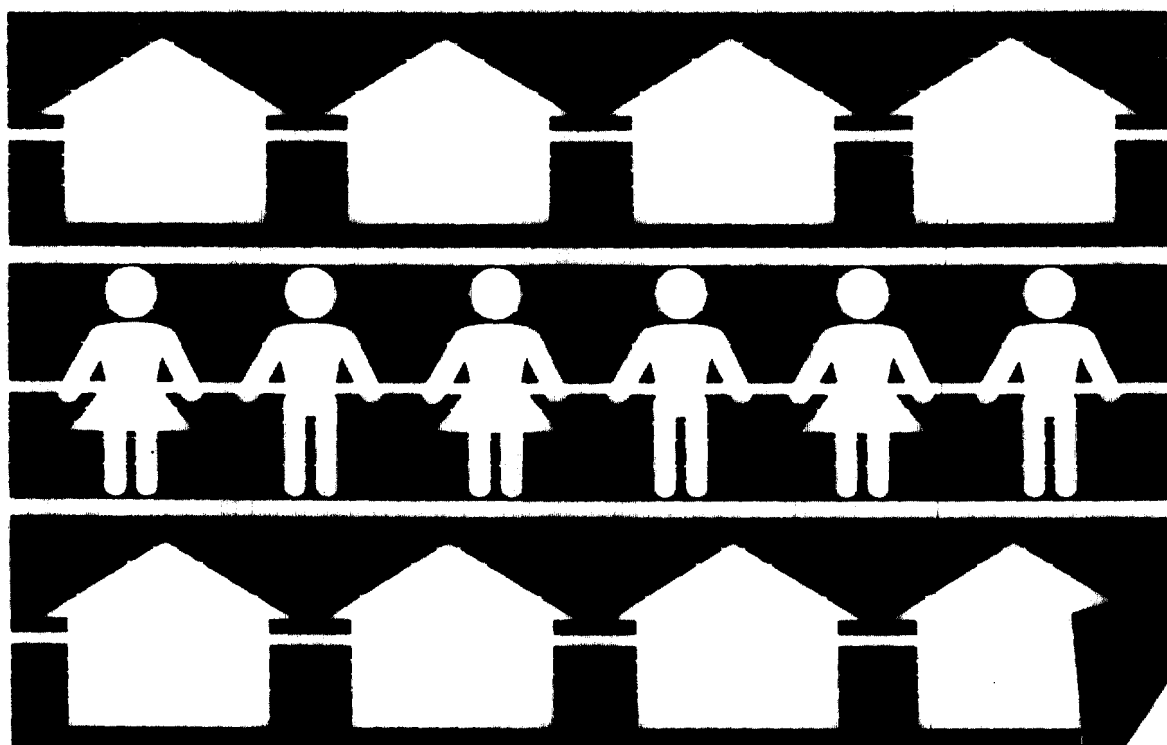
U.S. Department of Commerce
Economics and Statistics Administration
BUREAU OF THE CENSUS

1990 CPH-2-37

CENSUS '90



**1990 Census of
Population and Housing
Population and Housing
Unit Counts
Ohio**



R
60
C396
037
1990

Table 21. Population and Housing Units 1970 to 1990; Land Area and Density for Metropolitan Area: 1990—Con.

[For information concerning historical counts, see "User Notes." MA's are as defined for the 1990 census. Counts relate to component parts as defined at each census. Density is computed using land area. For definitions of terms and meanings of symbols, see text.]

Metropolitan Area	Population			Housing units			1990 area measurements				1990 density			
							Total area		Land area		Population per—		Housing units per—	
	1990	1980	1970	1990	1980	1970	Square kilometers	Square miles	Square kilometers	Square miles	Square kilometer	Square mile	Square kilometer	Square mile
Columbus, OH MSA														
The area.....	1 377 419	1 243 827	1 149 432	559 446	482 047	373 741	9 339.9	3 606.1	9 269.2	3 578.8	148.6	384.9	60.4	156.3
In central city.....	711 806	641 174	614 772	311 805	267 932	209 354	587.8	227.0	581.7	224.6	1 223.7	3 169.2	536.0	1 388.3
Columbus city.....	632 910	565 021	540 025	278 084	236 801	182 505	499.9	193.0	494.5	190.9	1 279.9	3 315.4	562.4	1 456.7
Lancaster city.....	34 507	34 953	32 911	14 754	14 004	11 720	40.6	15.7	40.5	15.7	852.0	2 197.9	364.3	939.7
Newark city.....	44 389	41 200	41 836	18 967	17 127	15 129	47.3	18.3	46.7	18.0	950.5	2 466.1	406.1	1 053.7
Not in central city.....	665 613	602 653	534 660	247 641	214 115	164 387	8 752.1	3 379.2	8 687.5	3 354.2	76.6	198.4	28.5	73.8
Delaware County.....	66 929	53 840	42 908	24 377	18 816	13 289	1 181.0	456.0	1 146.2	442.5	58.4	151.3	21.3	55.1
Fairfield County.....	103 461	93 678	73 301	39 014	33 883	24 866	1 317.2	508.6	1 309.9	505.7	79.0	204.6	29.8	77.1
Franklin County.....	961 437	869 126	833 249	405 418	347 234	271 253	1 407.3	543.3	1 398.5	540.0	687.5	1 780.4	289.9	750.8
Licking County.....	128 300	120 981	107 799	50 032	45 002	35 731	1 782.9	688.4	1 778.1	686.5	72.2	186.9	28.1	72.9
Madison County.....	37 068	33 004	28 318	12 621	11 361	8 703	1 206.9	466.0	1 205.0	465.2	30.8	79.7	10.5	27.1
Pickaway County.....	48 255	43 662	40 071	16 385	15 132	11 905	1 312.7	506.8	1 300.6	502.2	37.1	96.1	12.6	32.6
Union County.....	31 969	29 536	23 786	11 599	10 619	8 014	1 131.8	437.0	1 131.0	436.7	28.3	73.2	10.3	26.6
Dayton-Springfield, OH MSA														
The area.....	951 270	942 083	974 927	385 420	362 708	312 135	4 386.5	1 693.6	4 360.7	1 683.7	218.1	565.0	88.4	228.9
In central city.....	252 531	246 099	324 964	109 932	113 560	113 295	195.3	75.4	193.0	74.5	1 308.5	3 389.7	569.6	1 475.6
Dayton city.....	182 044	193 536	243 023	80 370	84 213	85 251	144.7	55.9	142.5	55.0	1 277.5	3 309.9	564.0	1 461.3
Springfield city.....	70 487	72 563	81 941	29 562	29 347	28 044	50.6	19.5	50.6	19.5	1 393.0	3 614.7	584.2	1 516.0
Not in central city.....	698 739	675 984	649 963	275 488	249 148	198 840	4 191.2	1 618.2	4 167.7	1 609.1	167.7	434.2	66.1	171.2
Clark County.....	147 548	150 236	157 115	58 377	56 398	50 071	1 045.9	403.8	1 036.1	400.0	142.4	368.9	56.3	145.9
Greene County.....	136 731	129 769	125 057	50 238	45 040	36 226	1 078.1	416.2	1 074.6	414.9	127.2	329.6	46.8	121.1
Miami County.....	93 182	90 381	84 342	35 985	33 688	27 792	1 059.8	409.2	1 054.2	407.0	88.4	228.9	34.1	88.4
Montgomery County.....	573 809	571 697	608 413	240 820	227 582	198 046	1 202.8	464.4	1 195.8	461.7	479.9	1 242.8	201.4	521.6
Huntington-Ashland, WV-KY-OH MSA (pt.)														
The area.....	61 834	63 849	56 868	24 788	23 564	19 180	1 184.4	457.3	1 179.6	455.4	52.4	135.8	21.0	54.4
In central city.....	61 834	63 849	56 868	24 788	23 564	19 180	1 184.4	457.3	1 179.6	455.4	52.4	135.8	21.0	54.4
Not in central city.....	61 834	63 849	56 868	24 788	23 564	19 180	1 184.4	457.3	1 179.6	455.4	52.4	135.8	21.0	54.4
Lawrence County.....	61 834	63 849	56 868	24 788	23 564	19 180	1 184.4	457.3	1 179.6	455.4	52.4	135.8	21.0	54.4
Lima, OH MSA														
The area.....	154 340	154 795	149 746	59 665	57 386	47 851	2 094.4	808.7	2 086.8	805.7	74.0	191.6	28.6	74.1
In central city.....	45 549	47 827	53 734	18 446	19 096	18 443	33.1	12.8	32.8	12.7	1 388.7	3 584.5	569.1	1 469.8
Lima city.....	45 549	47 827	53 734	18 446	19 096	18 443	33.1	12.8	32.8	12.7	1 388.7	3 584.5	569.1	1 469.8
Not in central city.....	108 791	106 968	96 012	40 999	38 290	29 408	2 061.3	795.9	2 054.0	793.1	53.0	137.2	20.0	51.7
Allen County.....	109 755	112 241	111 144	42 758	41 887	35 477	1 053.9	406.9	1 047.6	404.5	104.8	271.3	40.8	105.7
Auglaize County.....	44 585	42 554	38 602	16 907	15 499	12 374	1 040.5	401.7	1 039.3	401.3	42.9	111.1	16.3	42.1
Mansfield, OH MSA														
The area.....	126 137	131 205	129 997	50 350	49 171	41 631	1 295.9	500.4	1 287.3	497.0	98.0	253.8	39.1	101.3
In central city.....	50 627	53 927	55 047	21 909	22 469	19 314	72.3	27.9	72.3	27.9	700.2	1 814.6	303.0	785.3
Mansfield city.....	50 627	53 927	55 047	21 909	22 469	19 314	72.3	27.9	72.3	27.9	700.2	1 814.6	303.0	785.3
Not in central city.....	75 510	77 278	74 950	28 441	26 702	22 317	1 223.6	472.4	1 215.0	469.1	62.1	161.0	23.4	60.6
Richland County.....	126 137	131 205	129 997	50 350	49 171	41 631	1 295.9	500.4	1 287.3	497.0	98.0	253.8	39.1	101.3
Parkeburg-Marietta, WV-OH MSA (pt.)														
The area.....	62 254	64 266	57 160	25 752	23 960	19 004	1 658.1	640.2	1 645.3	635.2	37.8	98.0	15.7	40.5
In central city.....	15 026	16 467	16 861	6 481	6 673	5 843	20.6	8.0	19.9	7.7	755.1	1 951.4	325.7	841.7
Marietta city.....	15 026	16 467	16 861	6 481	6 673	5 843	20.6	8.0	19.9	7.7	755.1	1 951.4	325.7	841.7
Not in central city.....	47 228	47 799	40 299	19 271	17 287	13 161	1 637.5	632.2	1 625.4	627.5	29.1	75.3	11.9	30.7
Washington County.....	62 254	64 266	57 160	25 752	23 960	19 004	1 658.1	640.2	1 645.3	635.2	37.8	98.0	15.7	40.5
Steubenville-Weirton, OH-WV MSA (pt.)														
The area.....	80 298	91 564	96 193	33 911	35 668	31 392	1 064.2	410.9	1 061.0	409.6	75.7	196.0	32.0	82.8
In central city.....	22 125	26 400	30 771	9 996	11 152	10 895	21.0	8.1	21.0	8.1	1 053.6	2 731.5	476.0	1 234.1
Steubenville city.....	22 125	26 400	30 771	9 996	11 152	10 895	21.0	8.1	21.0	8.1	1 053.6	2 731.5	476.0	1 234.1
Not in central city.....	58 173	65 164	65 422	23 915	24 516	20 497	1 043.2	402.8	1 040.0	401.5	55.9	144.9	23.0	59.6
Jefferson County.....	80 298	91 564	96 193	33 911	35 668	31 392	1 064.2	410.9	1 061.0	409.6	75.7	196.0	32.0	82.8

Metrop

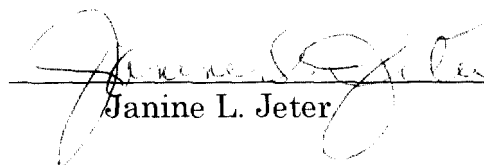


CERTIFICATE OF SERVICE

I, Janine L. Jeter, hereby declare that the foregoing Reply Comments were sent on this 23rd day of September, 1998, by first class mail, postage pre-paid, to the following:

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